

2000 NOV -1 A 4 26



October 30, 2000

Mr. Donald L. Averett, Reports Analyst
Reports Analysis Division
The Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Reference: Bank of America Corporation Political Action
Committee, FEC ID Number C00043489
June, July and August Monthly Reports

Dear Mr. Averett:
Public Affairs Support Services, Inc. (PASS) provides assistance to the Bank of America Corporation with the administration of the Bank of America Corporation Political Action Committee (the PAC), FEC ID Number C00043489.

This letter is in response to your two letters dated October 18, 2000 referencing the June, July and August Monthly Reports. The first issue raised concerned contributions to U.S. House candidates Bereuter, Crane, Delay and Menendez made after the primary election dates in their respective states. The PAC has requested that the following contributions be redesignated from the Primary 2000 to the General 2000 election:

Doug Bereuter to House	06/22/00	\$ 500.00
Phil Crane for House	06/22/00	\$ 500.00
Robert Menendez for House	06/30/00	\$1,000.00

The contribution to Rep. Delay made on 06/22/00 was incorrectly reported on the July Monthly Report. To correct this error, a memo redesignation was itemized on the September Monthly Report, electronically filed on September 19, 2000.

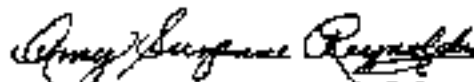
The second issue you brought to the PAC's attention concerned contributions to the Primary election campaigns of Rep. Roukema, Rep. Lazio (seeking a Senate seat), and Sen. Hutchison that appeared to be in excess of the applicable federal contribution limits. The PAC has requested that the following contributions be redesignated from the Primary 2000 to the General 2000 election:

Marge Roukema for Congress	06/22/00	\$ 500.00
Rick Lazio for Senate	06/22/00	\$1,000.00

The check for the contribution made to Sen. Hutchison's committee on 07/28/00 was returned to the PAC and subsequently voided. The voided transaction dated 09/19/00 was itemized on the October Monthly Report, electronically filed on October 17, 2000.

I trust that this letter is an adequate response to your correspondence. All redesignations will be reported on the upcoming 30-Day Post-General Report. However, if you have any questions, or if anything further is required of the Bank of America Corporation Political Action Committee, please call me at (703) 684-2915.

Sincerely,



Amy Suzanne Reynolds
Account Executive

cc: J. Mark Leggett, Treasurer
Greg Swenson, Assistant Treasurer

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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